

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

IN RE:)
) CASE NO. 15-16334
Curtis and Portia Gilmore)
) JUDGE Cox
Debtor)
) CHAPTER 13

Notice of Motion

TO: Tom Vaughn, 55 E Monroe St., Suite 3850, Chicago, Illinois 60603, via ECF;

Paul Bach, Counsel for Gothic Investments, Ltd., Bach Law Offices, P.O. Box 1285, Northbrook, IL 60062; via ECF;

Kevin J. Hermanek, Counsel for Rent-A-Center, Hermanek & Gara, P.C. 8 W. Monroe Street, suite 809, Chicago, Illinois 60603 via ECF; and

See creditors on attached service list.

PLEASE TAKE NOTICE that on December 10, 2015, at 11:00 am, I shall appear before the Honorable Judge Jacqueline P. Cox, or any Judge sitting in her place and stead, in Courtroom 680 in The Dirksen Federal Building located at 219 S Dearborn Street, Chicago, Illinois 60604 and present the attached motion and you may appear if you so choose.

PROOF OF SERVICE

The undersigned, an attorney, certifies that he served a copy of this notice and attachments to the above named addressed by first class mail, postage prepaid, from the mailbox located at 670 W Hubbard St, Ste. 202, Chicago, IL 60654, or otherwise via the methods listed above, on December 4, 2015.

/s/ Nicholas Perino

Swanson & Desai, LLC
Attorneys for the Debtors
670 W. Hubbard Street
Suite 270
Chicago, IL 60654
312-850-3325

AT&T Mobility II LLC

% AT&T Services, Inc

Karen Cavagnaro, Paralegal

One AT&T Way, Room 3A104

Bedminster, NJ 07921-2693

Acceptance Now

5501 Headquarters Dr

Plano, TX 75024-5837

Allied Cash Advance

C/O Real Time Resolutions, Inc.

PO Box 566027

Dallas, TX 75356-6027

Allied Collection Services

8550 Balboa Blvd

Suite 232

Northridge, CA 91325-5806

Ashro

1515 S 21st St

Clinton, IA 52732-6676

Ashro Lifestyle

c/o Creditors Bankruptcy Service

P.O. Box 800849

Dallas, TX 75380-0849

Atlas Acquisitions LLC (Check N Go SPDL)

294 Union St.

Hackensack, NJ 07601-4303

Atlas Acquisitions LLC (Iadvance)

294 Union St.

Hackensack, NJ 07601-4303

Capital One

Attn: Bankruptcy

Po Box 30285

Salt Lake City, UT 84130-0285

Capital One

Pob 30281

Salt Lake City, UT 84130-0281

Cash Loan by BMAC, Inc.

8314 1/2 S. Kedzie

Chicago, IL 60652-3309

Citibank N.A.

c/o Citibank (South Dakota), N.A.

ATTN: Claims Dept. MC 2235

701 E 60th Street North

Sioux Falls, SD 57104-0432

City of Chicago Department Revenue

c/o Arnold Scott Harris P.C.

111 W Jackson Blvd Ste 600

Chicago, IL 60604-3517

City of Chicago Dept of Finance

PO Box 88292

Chicago, IL 60680-1292

Cook Count Clerk's Office

118 North Clark St. Room 434

Chicago, IL 60602-1413

Cook County Treasurer's Office

118 N. Clark St., Suite 112

Chicago, IL 60602-1590

Credit Management Lp

4200 International Pkwy

Carrollton, TX 75007-1912

Dept Of Ed/nelnet

121 South 13th St

Lincoln, NE 68508-1904

Dept Of Education/neln

121 South 13th St

Lincoln, NE 68508-1904

Enhanced Recovery Corp

8014 Bayberry Rd

Jacksonville, FL 32256-7412

Enhanced Recovery Corp

Attention: Client Services

8014 Bayberry Rd

Jacksonville, FL 32256-7412

First Premier

3820 N Louise Ave

Sioux Falls, SD 57107-0145

First Premier Bank

3820 N Louise Ave

Sioux Falls, SD 57107-0145

GATEWAY FINANCIAL SOLUTIONS

PO BOX 3257

SAGINAW MI 48605-3257

Gatewayfinsol

999 S. Washington Ave Suite 1

Saginaw, MI 48601-2573

Ginnys/Swiss Colony Inc

1112 7th Ave

Monroe, WI 53566-1364

Ginnys/Swiss Colony Inc

Attn: Bankruptcy

1112 7th Ave

Monroe, WI 53566-1364

IL Dept of Health and Family svcs
Child support enforcement/mru
509 South 6th, 4th floor
Springfield, IL 62701-1809

Illinois Bell Telephone Company
% AT&T Services, Inc
Karen Cavagnaro, Paralegal
One AT&T Way, Room 3A104
Bedminster, NJ 07921-2693

Internal Revenue Service
PO Box 7346
Philadelphia, PA 19101-7346

Med Business Bureau
1460 Renaissance Dr
Park Ridge, IL 60068-1349

Med Business Bureau
Po Box 1219
Park Ridge, IL 60068-7219

Merchants Cr
223 W Jackson Blvd Ste 4
Chicago, IL 60606-6908

Merchants Cr
223 W. Jackson Blvd.
Suite 400
Chicago, IL 60606-6974

Overland Bond
4701 W Fullerton Ave
Chicago, IL 60639-1899

Overlnd Bond
4701 W. Fullerton Ave.
Chicago, IL 60639-1899

PEOPLES GAS LIGHT & COKE COMPANY
200 EAST RANDOLPH STREET
CHICAGO, ILLINOIS 60601-6434

Peoples Gas
200 East Randolph
Chicago, IL 60601-6302

Peoples Gas
Attention: Bankruptcy Department
130 E. Randolph 17th Floor
Chicago, IL 60601-6207

Pinnacle Credit Service
Attn: Bankruptcy
Po Box 640
Hopkins, MN 55343-0640

Pinnacle Credit Service
Po Box 640
Hopkins, MN 55343-0640

Progressive Leasing
11629 S 700 E, STE 100
Draper, UT 84020-8377

Quantum3 Group LLC as agent for
Sadino Funding LLC
PO Box 788
Kirkland, WA 98083-0788

Regional Acceptance Co
304 Kellm Road
Virginia Beach, VA 23462-2712

Regional Acceptance Corporation
PO Box 1847
Wilson, NC 27894-1847

Santander Consumer Usa
Po Box 961245
Ft Worth, TX 76161-0244

Seventh Avenue
c/o Creditors Bankruptcy Service
P.O. Box 800849
Dallas, TX 75380-0849

Southwest Credit Syste
4120 International
Carrollton, TX 75007-1958

Southwest Credit Syste
4120 International Parkway Suite 1100
Carrollton, TX 75007-1958

Sprint Corp. Attn: Bankruptcy Dept
P.O. Box 7949
Overland Park, KS 66207-0949

Stellar Recovery Inc
4500 Salisbury Rd Ste 10
Jacksonville, FL 32216-8035

U.S Department of Education/Nelnet
3015 South Parker Road, Suite 400
Aurora, CO 80014-2904

Vion Holdings LLC
c/o Capital Financial Credit, LLC
P.O. Box 543
Buford, GA 30515-0543

Curtis Gilmore III
1525 W 91st St
Chicago, IL 60620-5022

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

IN RE:)
) CASE NO. 15-16334
Curtis and Portia Gilmore)
) JUDGE Cox
Debtor)
) CHAPTER 13

MOTION TO MODIFY PLAN

NOW COMES, Curtis and Portia Gilmore, Debtors, by and through their attorneys, Swanson & Desai LLC, and moves this Honorable Court, to enter an order modifying the Debtor's Chapter 13 plan, and in support thereof, states as follows:

1. That this Court has jurisdiction over this proceeding pursuant to 28 U.S.C § 1334. Venue is proper pursuant to 28 USC § 1409(a). This is a core proceeding pursuant to 28 U.S.C. § 157.
2. The Debtors filed a petition for relief pursuant to Chapter 13 Title 11 U.S.C on May 7, 2015.
3. Debtors' case was confirmed by this Honorable Court on August 11, 2015.
4. Debtors' plan was confirmed with payment terms that provided for plan payments in the amount of \$1,210.00 for a period of 60 months, paying secured claims in full and unsecured claims a dividend of 10%.
5. Section E3.1(c) of the confirmed plan lists a claim for the Cook County Clerk in the amount of \$8,000.00 to be paid with an interest rate of 0% over the life of the plan.
6. Section E3.1(c) lists the incorrect claimant.
7. Debtors wish to modify their plan to amend Section E3.1(c) to list the claimant as Gothic Investments, Ltd. Further, Section E3.1(c) shall list the claim in the amount of \$11,387.00 with an interest rate of 18% to be paid at a set monthly rate of \$315.00.
8. The set monthly disbursement to Gothic Investments Ltd. will begin with the January 2017 disbursement and continue through the end of the Plan.
9. The Debtors wish amend Section D1 of the plan to increase the monthly plan payment from \$1,210.00 to \$1,420.00. Please see attached *Exhibit A*.

10. The Debtors request this motion be heard on shortened notice.
11. No parties to this case will be negatively impacted by entry of an order modifying the plan encompassing the relief Debtors seek with this motion.
12. Entry of this order, with entry of an agreed no-miss default order on post-petition property tax payments, will resolve the pending motion for relief from stay filed by Gothic Investments, Ltd.
13. Gothic Investments, Ltd. will tender a separate, no-miss default order at the hearing scheduled for December 10, 2015 at 11:00 a.m.

WHEREFORE, Curtis and Portia Gilmore, Debtors, respectfully pray this Honorable Court to enter an order modifying the Debtors' plan and any further relief this Court deems fair and just.

Respectfully submitted,

/s/ Nicholas Perino

Swanson & Desai, LLC
Attorneys for the Debtors
670 W. Hubbard Street
Suite 270
Chicago, IL 60654
312-850-3325